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October 4, 1982

SHULA R. BARASH  
DIANE C. WEIL

Julia Dragojevic, Esquire  
Contos & Bunch  
5855 Topanga Canyon Boulevard  
Suite 400  
Woodland Hills, California 91367

RE: Church of Scientology of California, Inc.  
vs. Gerald Armstrong, et al.  
Los Angeles Superior Court Case No. C 42153

Dear Ms. Dragojevic:

I am in receipt of your Notice of Taking Deposition of L. Ron Hubbard which appeared to have been served on the three law offices who are presently appearing in the above matter on behalf of the plaintiff, Church of Scientology of California, Inc.

There appears to be no subpoena attached to the Notice of Taking Deposition. Nor is it mentioned within the said Notice of Taking Deposition that the deposition is being taken pursuant to subpoena. I can only assume that you are serving this notice upon me in order to have me produce Mr. Hubbard at this deposition. I shall assume you are acquainted with the requirements of taking deposition as set forth in our California Code of Civil Procedure. I am sure you are also aware from reading the pleadings on file in the case, none of the attorneys or law firms appearing in this matter for the plaintiff have appeared, in any capacity whatsoever, on behalf of L. Ron Hubbard. In fact, none of the attorneys of record have any knowledge whatsoever of the whereabouts of L. Ron Hubbard.

Based upon your current notice of L. Ron Hubbard's deposition, I will be appearing at your offices on October 26, 1982 at 10:00 a.m., ready and willing to sit in on the deposition of L. Ron Hubbard in case you have somehow managed to personally serve Mr. Hubbard with a subpoena for his deposition. If in fact you have not served him with a subpoena and, prior to the taking of the said deposition on October 26, 1982 do not inform me of that fact, I will be moving for attorney fees and costs should I have to appear at your office needlessly.

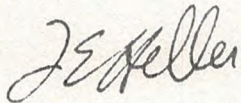


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You are further advised that should you attempt to in some manner enforce the Notice of Taking Deposition against the law offices of any of the counsel for plaintiff herein, said motion, whatever the contents of same may be, will be opposed with a prayer for sanctions under California Code of Civil Procedure Section 128.5.

I am sure it is possible that you have misinterpreted some state procedural requirement for taking a deposition or have somehow misconstrued from oral conversations that one of the plaintiff's counsel represents L. Ron Hubbard, formally or informally, in this matter. Obviously, you are new in notice or to the contrary. Consequently, in order to avoid ambiguity in the future, I would ask that all our future communication be written and not oral. Accordingly, I shall look forward to your written response to this correspondence.

Very truly yours,



Lawrence E. Heller  
of LENSKE, LENSKE, HELLER & MAGASIN  
A Law Corporation

LEH/plm

cc: John Peterson, Esquire  
Carl E. Kohlweck, Esquire